

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CONTOUR IP HOLDING, LLC and )  
ION WORLDWIDE, INC., )  
 )  
Plaintiffs, )  
 ) C.A. No. 15-1108 (LPS) (CJB)  
v. )  
 )  
GOPRO, INC., )  
 )  
Defendant. )

**DEFENDANT GOPRO, INC.'S MOTION TO STAY  
PENDING *INTER PARTES* REVIEW OF THE PATENTS-IN-SUIT**

Defendant GoPro, Inc. (“GoPro”) moves for a stay of this action pending *Inter Partes* Reviews of both patents-in-suit, U.S. Patent No. 8,890,954 and U.S. Patent No. 8,896,694. The grounds for this motion are set forth in GoPro’s opening brief filed concurrently.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Michael J. Flynn*

---

Jack B. Blumenfeld (#1014)  
Michael J. Flynn (#5333)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@mnat.com  
mflynn@mnat.com

*Attorneys for Defendant*

OF COUNSEL:

Karineh Khachatourian  
Patrick S. Salceda  
DUANE MORRIS LLP  
2475 Hanover Street  
Palo Alto, CA 94304  
(640) 847-4150

February 1, 2016

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1**

Pursuant to District of Delaware Local Rule 7.1.1, Defendant GoPro, Inc. (“GoPro”) hereby certifies that a reasonable effort has been made to reach agreement with Plaintiffs Contour IP Holding, LLC and iON Worldwide, Inc. on the matter set forth in GoPro’s Motion to Stay Pending *Inter Partes* Review of the Patents-in-Suit. The parties were unable to reach agreement.

*/s/ Michael J. Flynn*

---

Michael J. Flynn (#5333)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CONTOUR IP HOLDING, LLC and	)	
ION WORLDWIDE, INC.,	)	
	)	
Plaintiffs,	)	
	)	C.A. No. 15-1108 (LPS) (CJB)
v.	)	
	)	
GOPRO, INC.,	)	
	)	
Defendant.	)	

**[PROPOSED] ORDER GRANTING GOPRO, INC.'S MOTION  
TO STAY PENDING *INTER PARTES* REVIEW OF THE PATENTS-IN-SUIT**

WHEREAS, Defendant GoPro, Inc. filed a Motion to Stay Pending Inter Partes Review of the Patents-in-Suit; and

WHEREAS, the Court having considered the respective papers submitted by both parties, in support of, or in opposition to, said motion;

IT IS HEREBY ORDERED that:

Defendant GoPro, Inc.'s Motion is GRANTED

Dated: \_\_\_\_\_

\_\_\_\_\_  
J.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 1, 2016, upon the following in the manner indicated:

John W. Shaw, Esquire  
Andrew E. Russell, Esquire  
SHAW KELLER LLP  
300 Delaware Avenue, Suite 1120  
Wilmington, DE 19801  
*Attorneys for Plaintiffs*

*VIA ELECTRONIC MAIL*

Paul M. Schoenhard, Esquire  
Nicole M. Jantzi, Esquire  
ROPES & GRAY LLP  
2099 Pennsylvania Avenue NW  
Washington, DC 20006-6807  
*Attorneys for Plaintiffs*

*VIA ELECTRONIC MAIL*

*/s/ Michael J. Flynn*

---

Michael J. Flynn (#5333)